



June 14, 2012

Reply to Attn of:

LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/ Audrey D. Robinson

SUBJECT: Approval for NASA Employees in Senior Leadership and External Relations Positions to Attend the Space Camp Hall of Fame

In accordance with 5 CFR. § 2635.204(g)(2) and (3), I make the following determination:

Certain NASA employees who have Senior Leadership and External Relations Positions have been invited to attend the Space Camp Hall of Fame Ceremony and dinner at the United States Space and Rocket Center (USSRC) on Friday, June 15, 2012.

Over 100 complimentary invitations were sent to members of the Madison County legislative delegation, Madison County Commission, Huntsville and Madison mayors and council members, Alabama congressional delegation members and their in-town representatives, Redstone Arsenal, NASA and Marshall Space Flight Center leaders, active and retired astronauts, and current and past Hall of Fame awardees. Approximately 400 guests are expected and tickets for the dinner cost \$45. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g)(2).

This event is co-sponsored by ATK, Pratt & Whitney Rocketdyne, Huntsville Bottling Company - Coca-Cola, Teledyne Brown, ERC, Maynard Cooper Gale, and Yulista. The Huntsville City Schools and the Marriott are in-kind sponsors. ATK, Pratt & Whitney Rocketdyne (PWR), and Teledyne Brown (TB), are all NASA contractors.

Certain NASA employees with Senior Leadership or External Relations responsibilities have been invited to this event.¹ NASA personnel invited to attend this event presently, or may in the near future, have extensive involvement in matters relating to some of the sponsors. These personnel are similarly situated in that they each have responsibilities that could significantly influence current or future agreements with USSRC, ATK, PWR, and TB or could significantly affect the interests of USSRC, ATK, TB, and PWR.

¹ The NASA Associate Administrator, MSFC Acting Center Director, and MSFC Liaison to the US Space and Rocket Center, have been invited to attend this event.

I have determined that free attendance of these individuals and their spouse or guest at the event is in the interest of the agency because it will further agency programs and operations. The attendance of these NASA officials at the event will help to raise NASA's profile with local business and governmental leaders, will contribute to community relations, and will support NASA's statutory mandate to disseminate information about its programs.

Given the purpose of the event, NASA's interest in it, the broad attendance anticipated, and the reasonable market value of the event, I have determined that the value to the agency in having these individuals attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, NASA employees in the positions identified above may accept free attendance at the event. They may also accept invitations for an accompanying spouse or guest.

Teledyne and Maynard Cooper Gale are lobbying organizations and are registered under the Lobbying Disclosure Act. NASA employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge may attend only if they make arrangements with the sponsor to reimburse the \$45 cost per person of the reception.

Questions about this determination may be addressed to Annette Metcalf Coffel at 256-544-0025.

A handwritten signature in black ink, appearing to read "Audrey D. Robinson", followed by a long horizontal line.

Audrey D. Robinson
Chief Counsel